

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
HARRISONBURG DIVISION**

KAREN IOVINO,

Plaintiff

v.

MICHAEL STAPLETON ASSOCIATES,

LTD. d/b/a MSA SECURITY, INC.,

Defendant.

)
)
)
)
)
)
)
)
)
)

Civil Action No. 5:21-cv-00064

**DECLARATION OF KAREN J. GRAY IN SUPPORT OF
PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE**

1. Pursuant to 28 U.S.C. § 1746, I, Karen J Gray, declare under the laws of the United States of America under penalty of perjury that the following statements are true and correct.
2. I serve as the General Counsel of Government Accountability Project. I have served in this role for approximately fourteen years, beginning in January 2007.
3. On Thursday, August 8, 2024, I transmitted via email a letter to Defendant's counsel, Mr. Dan Ward, regarding the July 24, 2024 Memorandum Opinion (Document 177) and Order to Show Cause (Document 178) issued by this Court. (Attached as "Exhibit A").
4. The purpose of my letter was to inquire as to whether Defendant's counsel conferred with Plaintiff's counsel, Mr. Thad Guyer, to obtain copies of the cases that were miscited prior to filing a response to Plaintiff's Rule 72(a) Objections to Magistrate's Memorandum Opinion and Order (Document 173), and to determine what methods Mr. Ward's firm used to conduct their research before concluding that the cases did not exist. I attached both cases, provided by Mr. Guyer, to the email and letter. (Attached as "Exhibit B").

5. On Tuesday, August 13, 2024, I received an email and attached letter from Mr. Ward's associate regarding the steps he took to locate the cases. (Attached as "Exhibit C").

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 13, 2024.

Respectfully Submitted,

 /S/

Karen J. Gray, Esq.